



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY

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October 20, 2005

SENT BY E-Mail, and
First Class U.S. Mail

Meabh Purcell, Esq.
LeBoeuf, Lamb, Green & MacRae LLP
260 Franklin Street
Boston, MA 02110-3173

Re: Fitchburg Gas and Electric Light Company, D.T.E. 05-64

Dear Ms. Purcell:

Enclosed is the second set of information requests by the Department of Telecommunications and Energy to Fitchburg Gas and Electric Light Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., October 26, 2005.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

SECOND SET OF INFORMATION REQUEST OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
FITCHBURG GAS AND ELECTRIC LIGHT COMPANY
D.T.E. 05-64

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Fitchburg Gas and Electric Light Company ("Fitchburg" or "Company") the following information request(s).

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List in D.T.E. 04-48, and three copies of the responses to Jody M. Stiefel, Hearing Officer.

Requests

- DTE 2-1 Refer to the pre-filed testimony of Laurence M. Brock at 9. Please provide information comparable to that requested in Information Request DTE 1-1 for Unitil's PBOP plans.
- DTE 2-2 Refer to the pre-filed testimony of Laurence M. Brock at 8-9. Is it possible that at some future time, Unitil would apply Fitchburg's pension and PBOP prepayments to offset the liabilities of other plan participants? Explain why or why not.
- DTE 2-3 Did the Company have any additional minimum liability associated with its pension plan as of December 31, 2004? Also, does the Company anticipate having any additional minimum liability for the pension plan at the end of 2005?